

REMARKS

Claims 1-20 are pending. Reconsideration and allowance of all pending claims of this application in light of the foregoing amendments and the following remarks are respectfully requested.

Rejections Under 35 U.S.C. §102

Claims 1-4, 6, 8, 9, and 11-20 stand rejected under 35 U.S.C. §102(c) as being anticipated by U.S. Patent No. 6,779,039 to Bommareddy et al. (hereinafter "Bommareddy"). Applicants respectfully traverse the subject rejection for the following reasons.

In particular, the PTO provides in MPEP § 2131 that "[t]o anticipate a claim, the reference must teach every element of the claim. . . ." Therefore, with respect to each of independent claims 1 and 8, to sustain this rejection, the Bommareddy reference must contain all of the elements of the subject claim.

According to the Examiner, Bommareddy teaches an identification uniquely assigned to a subscriber at column 6, lines 65-67. The only "identification uniquely assigned to a subscriber" mentioned in the cited text is a packet destination IP address; therefore, it is assumed that it is the Examiner's position that the packet destination IP address reads on Applicants' identification uniquely assigned to a subscriber.

This being the case, the portion of Bommareddy cited as teaching "translating the identifier [comprising an identification uniquely assigned to a subscriber] into a group identification representative of a plurality of identifiers" as required by claim 1 clearly fails to do so. The Examiner cites column 6, lines 30-60, and column 7, lines 20-25 as teaching this element. However, no where in the cited text does Bommareddy teach translating the packet destination IP address into anything, much less into a group identification representative of a plurality of identifiers, as required by claim 1.

Additionally, it is apparent that the portion of Bommareddy cited as teaching "responsive to translating the identifier, indexing an address table using the group identification" clearly fails to do so. In particular, column 7, lines 12-15 of Bommareddy states:

Internally, in a maintain operational router list operation 312 the traffic distributor 300 maintains a list of operational routers. Fields from the packet are used to compute the index into the list, identifying the active router.

Therefore, while the cited text teaches, generally, indexing a list of routers, this is clearly not the same as indexing an address table using the group identification, as recited in claim 1.

For all of the foregoing reasons, the subject rejection of independent claim 1 is not supported by Bommareddy and should be withdrawn. Independent claim 8 contains limitations similar to those of claim 1 described above and is therefore also allowable over Bommareddy for the same reasons as set forth with

respect to claim 1. Claims 2-4, 6, 9, and 11-20 depend from and further limit claims 1 and 8 and are therefore also allowable over Bommareddy for at least the same reasons set forth above with respect to claim 1.

Rejections under 35 U.S.C. §103

Claims 5, 7, and 10 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bommareddy, as applied to claims 1 and 8 above, in view of] U.S. Patent No. 6,976,090 to Ben-Shaul (hereinafter "Ben-Shaul"). In response, Applicants respectfully traverse the rejection and submit that, because claims 5, 7, and 10 depend from and further limit claims 1 and 8, the claims are allowable for at least the same reasons set forth above with respect to claims 1 and 8.

Conclusion

It is clear from the foregoing that independent claims 1 and 8 are in condition for allowance. Claims 2-7 and 9-20 depend from and further limit claims 1 and 8 and are therefore also deemed to be in condition for allowance.

In view of the foregoing, an early formal notice of allowance of claims 1-20 is requested. The Examiner is invited to call the undersigned at the below-listed telephone number if a telephone conference would expedite or aid the prosecution and examination of this application.

Respectfully submitted,



Brandi W. Sarfatis
Registration No. 37,713

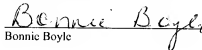
Dated: December 21, 2006

HAYNES AND BOONE, LLP
901 Main Street, Suite 3100
Dallas, Texas 75202-3789
Telephone: 214/651-5896
Facsimile: 214/200-0948
Client Matter No.: 14882USRR01/22171.391

D-1488809_1.DOC

Certificate of Service

I hereby certify that this correspondence is being filed with the U.S. Patent and Trademark Office via EFS-Web on December 21, 2006.


Bonnie Boyle